

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MARQUELL DAVIS,
RAMONE BRADLEY, and
EDMUND SINGLETON

24 CR 503

Hon. Matthew F. Kennelly

**GOVERNMENT'S UNOPPOSED MOTION
FOR EARLY RETURN OF TRIAL SUBPOENAS**

The UNITED STATES OF AMERICA, by its attorney, MORRIS PASQUAL, Acting United States Attorney for the Northern District of Illinois, hereby moves for the early return of trial subpoenas in the above-captioned matter. The government states as follows in support of this motion.

1. The indictment in this case charges defendants with various carjacking and firearms offenses, in violation of Title 18, United States Code, Sections 371, 924(c)(1)(A), and 2119.

2. By this motion, the government seeks the entry of an order authorizing both the government and the defendant to issue subpoenas pursuant to Rule 17(c) of the Federal Rules of Criminal Procedure, bearing a return date prior to the date of the defendants' trial. Moreover, the government respectfully requests that the party issuing such a subpoena: (1) be authorized to instruct the party named in the subpoena to present subpoenaed materials to the issuing party in lieu of personal appearance before the Court; and (2) be ordered to make any subpoenaed material

available to the opposing party pursuant to the discovery and disclosure rules under Federal Rules of Criminal Procedure, Rule 16

3. Counsel for the government has conferred with each counsel of record for the defendants, who do not object to this motion.

WHEREFORE, the government respectfully requests that the Court authorize the parties to issue trial subpoenas with a return date prior to the date of trial, subject to an obligation of mandatory reciprocal disclosure.

Respectfully submitted.

MORRIS PASQUAL
Acting United States Attorney

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